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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SERGIO MOMOX-CASELIS, MARIA  
MOMOX-CASELIS; NICOLASA  
HERNANDEZ, as Special Administrator of the  
estate of M.M., born May 15, 2013 and died  
October 12, 2014,

Plaintiffs,

vs.

MAIRA JUAREZ-PAEZ; LISA-RUIZ-LEE; KIM  
KALLAS; TARA DONOHUE; BETH ANN  
NELSON; JEREMY LAW; IRENE KOZIKI;  
SHUUANDY ALVAREZ, individuals; Estate of  
JOAQUIN JUAREZ-PAEZ; DOE individuals I-  
X; ROE CLARK COUNTY DEPARTMENT OF  
FAMILY SERVICES EMPLOYEES XI-XX,  
individually and in their official capacities;  
CLARK COUNTY DEPARTMENT OF  
FAMILY SERVICES; COUNTY OF CLARK, a  
political subdivision of the State of Nevada; and  
ZOE CORPORATIONS XXI-XXX,

Defendants.

CASE NO. 2:16-cv-00054-APG-GWF

**STIPULATION AND ORDER TO**  
**AMEND COMPLAINT**

COME NOW the parties hereto by and through their respective counsel, and hereby  
stipulates and agrees as follows:



1 WHEREAS Plaintiffs named Beth Ann Nelson, Kim Kallas and Tara Donahue as  
 2 Defendants based upon information and belief that they were the supervisors of Defendants  
 3 Shuuandy Alvarez, Jeremy Law and Irene Koziki,

4 WHEREAS Plaintiffs have been informed that Tara Donahue was the supervisor of  
 5 Defendant Jeremy Law, but not Defendants Shuuandy Alvarez and Irene Koziki,  
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7 WHEREAS Plaintiffs have been informed that Kim Kallas was the supervisor of Defendant  
 8 Irene Koziki, but not Defendants Shuuandy Alvarez and Jeremy Law, and

9 WHEREAS Plaintiffs have been informed that Patricia Meyers was Defendant Shuuandy  
 10 Alarez's supervisor, and that Beth Ann Nelson had no involvement with M.M.,

11 IT IS HEREBY STIPULATED AND AGREED that the Complaint be amended to  
 12 substitute Patricia Meyers in place and stead of Beth Ann Nelson, and to correct the relationships  
 13 of the parties. A copy of the proposed Second Amended Complaint is attached hereto as Exhibit 1.  
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15 DATED this 23rd day of February, 2017.

DATED this 23rd day of February, 2017.

16 GANZ & HAUF

OLSON, CANNON, GORMLEY, ANGULO  
 & STOBERSKI

17 /s/ Marjorie Hauf

/s/ Felicia Galati

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 19 MARJORIE HAUF, ESQ.  
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 20 8950 W. Tropicana Avenue, Suite 1  
 Las Vegas, Nevada 89147  
 21 Attorney for Plaintiffs

22 FELICIA GALATI, ESQ.  
 Nevada Bar No. 7341  
 9950 W. Cheyenne Avenue  
 Las Vegas, NV 89129  
 Attorney for Defendants, Lisa Ruiz-Lee; Kim  
 Kallas; Tara Donohue; Beth Ann Nelson;  
 Jeremy Law; Irene Koziki; and Shuuandy  
 Alvararez

23  
 24 **ORDER**

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 26 **IT IS SO ORDERED.**

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 UNITED STATES DISTRICT JUDGE  
 Dated: February 23, 2017.

1 DATED this 23rd day of February, 2017.

2 BREMER WHYTE BROWN & O'MEARA, LLP

3 /s/ Elizabeth Deane

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ELIZABETH DEANE, ESQ.  
Nevada Bar No. 13600  
5 1160 N. Town Center Drive, Suite 250  
6 Las Vegas, NV 89144  
Attorney for Defendant,  
7 *Estate of Joaquin Juarez-Paez*

8 **ORDER**

9 IT IS SO ORDERED.

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11 DISTRICT COURT JUDGE  
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